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MEMO ENDORSED:

The application is denied.

SO ORDERED.

A handwritten signature in black ink that reads "Paul G. Gardephe".

Paul G. Gardephe
United States District Judge
Dated: March 10, 2022

March 10, 2022

VIA ECF

Hon. Paul G. Gardephe
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Gulkarov, et al.*, 22-cr-20 (PGG) (Gulkarov and Israilov)

Dear Judge Gardephe:

We represent Defendant Roman Israilov ("Israilov") in the above-referenced case. We respectfully write to request a temporary bail modification to permit Mr. Israilov to attend the bris and family gathering of his wife's cousin's son to be held on Sunday, March 13, in Manhattan from the hours of 5-11 pm. As the Court is aware (*see* ECF Docs. 34, 41, 44, 47), Mr. Israilov's and co-defendant Alexander Gulkarov's wives are sisters. The Court previously denied these defendants' bail request to associate outside the presence of counsel for family purposes. (ECF Doc. 47.) Because the bris and family gathering are Mr. Israilov's wife's family, Mr. Gulkarov and his family are also invited to attend this important family event.

We respectfully request that the Court allow this temporary modification of Mr. Israilov's bail to allow him to attend the bris with his wife and children. We agree to have an attorney from our firm to attend the event with Mr. Israilov and his family to provide reasonable assurance that Mr. Israilov will not be alone with his co-defendant during the event and discuss matters related to the case. Of course, this is not the purpose of the bris and family gathering. It is expected to be attended by many members of Mr. Israilov's wife's family, including family members who live out-of-town. Since the pandemic, there have been few opportunities for the family to gather in one place. Therefore, this event has a special meaning for Roman and his wife.

We have conferred with Pretrial Services regarding this request and they take no position. As to the government, we conferred with AUSAs Andrews and Pellegrino, and they continue to object for reasons earlier stated on the record.

If the Court grants this request, we will notify Pretrial Services and provide full details about the location and other contact information during the event.

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March 10, 2022
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We are available to be heard on this matter at the Court's convenience.

Respectfully submitted,

/s/ HEM

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Counsel for Defendant Roman Israilov